

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NIRVANA, L.L.C.,

Plaintiff,

v.

QITIANLY, et al.,

Defendants.

Case No. 21-cv-01983

**Judge Martha M. Pacold**

**Magistrate Judge Jeffrey T. Gilbert**

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT**

Plaintiff Nirvana, L.L.C. ("Plaintiff" or "Nirvana"), by its counsel, requests an entry of Default against all defendants pursuant to Fed. R. Civ. P. 55(a). In support of this Motion, Nirvana submits the accompanying Memorandum and a further Declaration of Justin R. Gaudio.

Dated this 29th day of June 2021.

Respectfully submitted,

/s/ Justin R. Gaudio

Amy C. Ziegler

Justin R. Gaudio

Jake M. Christensen

Isaku M. Begert

Greer, Burns & Crain, Ltd.

300 South Wacker Drive, Suite 2500

Chicago, Illinois 60606

312.360.0080 / 312.360.9315 (facsimile)

aziegler@gbc.law

jgaudio@gbc.law

jchristensen@gbc.law

ibegert@gbc.law

*Counsel for Plaintiff Nirvana, L.L.C.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of June 2021, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website and I will send an e-mail to the e-mail addresses identified in Exhibit 2 to the Declaration of Eric Gelwicks and any e-mail addresses provided for Defendants by third parties that includes a link to said website.

/s/ Justin R. Gaudio  
Amy C. Ziegler  
Justin R. Gaudio  
Jake M. Christensen  
Isaku M. Begert  
Greer, Burns & Crain, Ltd.  
300 South Wacker Drive, Suite 2500  
Chicago, Illinois 60606  
312.360.0080 / 312.360.9315 (facsimile)  
aziegler@gbc.law  
jgaudio@gbc.law  
jchristensen@gbc.law  
ibegert@gbc.law

*Counsel for Plaintiff Nirvana, L.L.C.*